

**SUSMAN GODFREY L.L.P.**

A REGISTERED LIMITED LIABILITY PARTNERSHIP  
SUITE 3000  
401 UNION STREET  
SEATTLE, WASHINGTON 98101-2668  
(206) 516-3880  
FAX (206) 516-3883  
WWW.SUSMANGODFREY.COM

SUITE 5100  
1000 LOUISIANA STREET  
HOUSTON, TEXAS 77002-5096  
(713) 651-9366

SUITE 1400  
1900 AVENUE OF THE STARS  
LOS ANGELES, CALIFORNIA 90067-6029  
(310) 789-3100

32ND FLOOR  
1301 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019-6023  
(212) 336-8330

IAN M. GORE  
DIRECT DIAL (206) 505-3841

E-MAIL IGORE@SUSMANGODFREY.COM

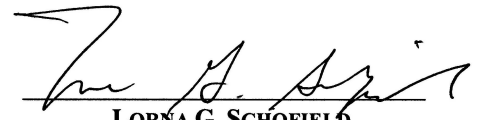
**Application GRANTED. The parties shall jointly file a proposed civil case management plan and scheduling order by November 2, 2022.**

October 12, 2022

VIA ECF

**Dated: October 13, 2022  
New York, New York**

The Honorable Lorna G. Schofield  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007



**LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE**

Re: Consent Motion for Extension of Time to File Proposed Case Management Plan for *King v. Habib Bank Ltd.*, Case No. 20-cv-4322-LGS

Dear Judge Schofield:

On September 28, 2022, the Court granted in part and denied in part Defendant's motion to dismiss, and ordered the parties to meet and file a proposed civil case management plan and scheduling order by October 19, 2022. *See* Dkt. No. 56. Pursuant to the Court's Individual Rules and Procedures for Civil Cases, the parties respectfully request a 14-day extension to file the proposed case management plan and scheduling order to November 2, 2022. This is the first request for an extension of time to file the proposed case management plan and scheduling order.

Good cause exists for the requested extension. The undersigned counsel and his colleagues at Susman Godfrey L.L.P. have just entered appearances in the case as lead trial counsel for Plaintiffs in this action and need the additional time to confer on case management issues with the Defendant. Moreover, the parties are discussing several important case management issues, including whether an agreement can be reached regarding the initial scope of discovery, the timing of Defendant's renewed motion to dismiss on personal jurisdiction, and the degree to which foreign bank secrecy issues may impact discovery. The additional time will assist the parties to determine the degree to which any dispute on those issues can be resolved without Court intervention.

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For the foregoing reasons, the parties respectfully move that the time to file the proposed civil case management plan and scheduling order be extended to November 2, 2022.

Sincerely,

*/s/ Ian M. Gore*

Ian M. Gore